

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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*Counsel to the Official Committee of
Unsecured Creditors*

In re:

NATIONAL REALTY INVESTMENT
ADVISORS, LLC, *et al.*¹,

Debtors.

Chapter 11

Case No: 22-14539-JKS

(Jointly Administered)

Re: Docket Nos. 265 and 617

**JOINDER OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO THE
DEBTORS' OBJECTION TO MOTION OF METROPOLITAN YMCA OF THE
ORANGES FOR AN ORDER GRANTING RELIEF FROM THE AUTOMATIC STAY
TO EXERCISE REMEDIES UNDER CONTRACT**

The Official Committee of Unsecured Creditors (the “**Committee**”) appointed in the above-captioned jointly administered chapter 11 cases (the “**Chapter 11 Cases**”) of National Realty Investment Advisors, LLC, *et al.* (the “**Debtors**”), by and through its undersigned counsel, hereby joins in the objection (the “**Objection**”) [Dkt. No. 617] of the Debtors to the *Motion of Metropolitan YMCA of the Oranges for an Order Granting Relief From the Automatic Stay to*

¹ A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://omniagentsolutions.com/NRIA>. The location of the Debtors’ service address is: 1 Harmon Plaza, Floor 9, Secaucus, New Jersey 07094.

Exercise Remedies Under Contract [Dkt. No. 265] (the “**Motion**”) filed by Metropolitan YMCA of the Oranges (“**Metro YMCA**”), and respectfully states as follows:

JOINDER

1. The Committee has reviewed the Objection and shares in the concerns and objections raised by the Debtors.

2. The Committee respectfully joins in the substantive arguments raised in the Objection and adopts and incorporates such arguments as if more fully set forth herein.

3. The Committee submits that relief from the automatic stay should not be granted to terminate the Sale Agreement at this time, and the Debtors should be afforded their contractual rights in order proceed to attempt to maximize the value of this asset for the estate and its creditors.

4. The Committee respectfully reserves the right to raise and present additional authorities, arguments, evidence and objections in connection with the matters addressed in the foregoing pleadings or that may arise in a future hearing. In the event that the Objection is withdrawn or otherwise resolved, the Committee further reserves the right to present argument on the Motion.

CONCLUSION

WHEREFORE, the Committee respectfully requests that the Court deny the Motion and grant such other and further relief as the Court deems just and proper.

[See signature on next page]

Respectfully submitted,

THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS

Dated: September 23, 2022

/s/ Louis T. DeLucia

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